REMARKS/ARGUMENTS

Claims 1-11 are pending in this application.

Claims 1, 2, 7, 8, and 11 had been rejected under 35 U.S.C. § 102(b) over Sezan et al. (U.S. Patent No. 5,682,205). This rejection is respectfully traversed for the following reasons.

Unless a publication discloses within the four corners of the document not only all of the elements and limitations claimed but also all of the elements and limitations arranged or combined in the same way as recited in the claim, it cannot be said to prove prior invention of the thing claimed and, thus, cannot anticipate under 35 U.S.C. § 102.[1]

Claims 1, 2, 7, 8, and 11 comprise identifying a trajectory for **each** pixel of the acquired images from and applying an operation to the images along the trajectory.

Sezan discloses a method for manipulating video frames based on determining the motion of the **majority** of the pixels in the frame (for example because of camera moving) and then determining which pixels are not following this trajectory (because they move or change relative to the rest of the frame).

The portions of Sezan cited in the pending final Office Action for the aforementioned elements of Claims 1, 2, 7, 8, and 11 (Sezan, col. 12, lines 48-51, and col. 13, lines 63-65) deal with determining whether particular pixels follow the overall frame trajectory or moving individually out-of-sync with the most of the frame content.

Contrary to identifying a trajectory for **each** pixel and then applying the operation along the trajectory, as recited in Claims 1, 2, 7, 8, and 11, Sezan addresses the situation when **trajectories of some pixels are not known** and discloses a method of identifying such pixels **without ever identifying their actual trajectories**.

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[1] *Net MoneyIN, Inc. v. VeriSign, Inc.*, 545 F.3d 1359, 1369 (Fed. Cir. 2008) (quoting *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 1548 (Fed. Cir. 1983))

The pending final Office Action incorrectly equates Sezan applying an operation to **identify pixels with unknown trajectories without identifying their trajectories** before or after the operation and Claims1, 2, 7, 8, and 11 reciting applying an operation to known trajectories of pixels, wherein **trajectories of all pixels are known** before applying the operation.

Since identifying a trajectory for each pixel of the acquired images from and applying an operation to the images along the trajectory is not disclosed in Sezan, Claims 1, 2, 7, 8, and 11 are not anticipated by and are patentable over Sezan under 35 U.S.C. § 102(b) and should be allowed.

Claims 3 and 4 had been rejected under 35 U.S.C. § 103(a) over Sezan in view of Bouguet et al. (U.S. Patent Pub. No. 2003/0012408). Claims 5 and 9 had been rejected under 35 U.S.C. § 103(a) over Sezan in view of Bouguet and further in view of Powers (U.S. Patent No. 4,400,719). Claims 6 and 10 had been rejected under 35 U.S.C. § 103(a) over Sezan in view of Walton (U.S. Patent No. 3,967,054). These rejections are respectfully traversed for the following reasons.

If an independent claim is non-obvious under 35 U.S.C. § 103, then any claim depending therefrom is non-obvious.[2]

Claims 3-6 and 9-10 depend on Claims 1 and 7, which, as explained above, are patentable and, therefore, non-obvious. Therefore, Claims 3-6 and 9-10 are patentable over Sezan, Bouguet, Powers, and Walton under 35 U.S.C. § 103(a) and should be allowed.

It is believed that the present application is in condition for allowance. A Notice of Allowance is respectfully solicited in this case. Should any questions arise, the Examiner is encouraged to contact the undersigned.

Respectfully submitted,

[2] *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988).

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